

Application Serial No. 09/697,062

REMARKS

Applicant notes in the Response To Arguments in the above-identified Office Action that the Examiner has taken the position that "the claims fail to limit how the exchange would be accomplished." This statement is made in connection with the exchange of information in the present invention. Applicant understands the nature of the basic rejections set forth by the Examiner pursuant to 35 USC 103 (obviousness) to be that Applicant's admitted prior art (Triad) provide an account management system and that Ratneraj is relied upon to show a basic Internet database system that could be adapted to operate in connection with the prior art Triad system. In Applicant's previous responses, Applicant has sought to both distinguish the claimed invention from the Examiner's proposed combination and to point out that the proposed combination did not meet the claim limitations as set forth in the Applicant's originally submitted claims.

Applicant refers the Examiner to Applicant's previous arguments in regard to distinctions to be made between the claimed invention and the proposed combination of references used by the Examiner to conclude that the invention is obvious. Application notes that it is not trivial to adapt Applicant's prior art system to an Internet platform and that the development took considerable time and expense, as well as inventive talent on the part of Applicant.

Applicant very much appreciates the Examiner's spirit of cooperation and the Examiner's attempts to assist the Applicant in finding ways of introducing limitations into the claims that would overcome the Examiner's proposed combination of references. Applicant notes the Examiner has maintained that "limitations describing how the interaction is accomplished is still not in the claim language." To address the Examiner's concern with regard to Applicant's "broadly recited claims" Applicant has further defined the interaction of the various elements of the claimed invention. In particular, Applicant has provided additional detail with regard to the "cycle" which occurs at the central data center

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by providing "a calling program [that is] called to compute a new behavior score, sort accounts into treatment groups, and return a set of actions." This limitation has been entered into independent Claims 1, 25, 26, 27, and 29. Support for this claim limitation is found in Figure 4 and beginning at page 16, line 20 and continuing to page 18, line 6, among other locations within the Specification. Applicant submits that this limitation very specifically defines the manner in which data are exchanged between the various elements of the claimed invention in a way that is not known from the art of record.

Applicant has further defined the central data center and the operation of a cycle (where the cycle refers to the set of operations performed by the invention in connection with an account and account management) where the "cycle comprises a processing order, comprising: assigning an account to a strategic portfolio; assigning strategy ID's for decision areas; calculating a behavior score; reviewing an account for credit line actions; reviewing said account for delinquent actions; reviewing said account for over limit actions; writing to a report record file; and returning actions and other data to said calling program." Thus, between this limitation and the aforementioned limitation in connection with the cycle, Applicant has defined the location of a data center process by a calling program, the responsive actions taken by the calling program, and the return of data to the calling program by the data center. This interaction between the client and the data center and the exchange of information, in connection with the operation of a calling program is unique to the invention and is not found in the art of record, nor would a person skilled in the art be instructed by the art of record to produce such a combination.

As with Applicant's aforementioned description of the cycle, support for the limitations added in connection with the central data center are likewise found in the Specification beginning at page 16 and further in connection with Figure 4. Additionally, such limitation has been entered to Claims 1, 25, 26, 27, and 29.

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Applicant's claim amendments are made solely to clarify that which is claimed and not by way of limiting the subject matter of the application. Accordingly, Applicant expressly reserves the right to seek protection of similar scope to that originally sought in a further submission at a later time and does not expressly abandon any subject matter to which Applicant may be entitled.

Should the Examiner deem it helpful, he is encouraged to contact Applicant's attorney at (650) 474-8400.

Respectfully Submitted,



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